

L	1	2	2	ORR	9			
RT	#S	LT	DT	UT	IA	IR	OR	TS

RECEIVED

SEP 16 2004  
RmR-5-119  
YOSEMITE NATIONAL PARK

Alan Kunz

To: Mitzi Thornley/YOSE/NPS@NPS

09/13/2004 01:45 PM  
PDT

cc:  
Subject: Scoping CommentsComments on Merced River CMP

Pg 1

----- Forwarded by Alan Kunz/YOSE/NPS on 09/13/2004 01:48 PM -----



09/10/2004 05:35 PM  
MST

To: Planning Team <yose\_planning@nps.gov.>  
cc: (bcc: YOSE Planning)  
Subject: Scoping CommentsComments on Merced River CMP

Planning Team,

The attached file, in Microsoft Word 6.0, contains the scoping comments of the Yosemite Area Chapter of the National Audubon Society on the revision to the Comprehensive Management Plan for the Wild and Scenic Merced River.

Please confirm receipt of this message by return E-mail to the above address.



CMP Scoping 090904.DC

RECEIVED

**YOSEMITE AREA AUDUBON**SEP 16 2004  
RMR-S-119  
YOSEMITE NATIONAL PARK

Tel/Fax:

Mariposa, CA

E-mail:

To: Yosemite Planning

From:

Subject: Revised CMP

Date: September 9, 2004

The following are the scoping comments of the Yosemite Area Chapter (YAA) of the National Audubon Society on the proposed revision of the Comprehensive Management Plan (CMP) for the Wild and Scenic Merced River.

**OVERVIEW**

Press releases by NPS and mailed communications have implied that the revisions to address the court ordered consideration of "User Capacity" are of minor importance and do not affect other proposed projects in Yosemite Valley. YAA emphatically disagrees with this interpretation of the court's ruling. In its decision, the appeals court stated:

*"While we remanded to the district court to enter an appropriate order requiring the [National Park Service] to remedy these deficiencies [user capacity and El Portal area boundaries] in the CMP [Merced River Plan] in a timely manner, id. At 803, we did not 'otherwise uphold the [CMP].'" (Emphasis added.)*

The Yosemite Valley Plan (YVP) tiers to the CMP. Various projects proposed in the YVP have not been analyzed for their impacts to the "Outstandingly Remarkable Values (ORVs)" that qualify the River for designation as a component of the National Wild and Scenic River System. They have also not been analyzed for their impacts on the "User Capacity." The revised CMP must not only present such analyses and demonstrate how the proposed projects affect the user capacity; but also explain the present condition of the several ORVs and describe -- in quantitative terms -- how these projects **protect and enhance** them. The user capacity

RECEIVED

SEP 16 2004  
RMR-S-119  
YOSEMITE NATIONAL PARK

Pg 3

itself is a dependent function on management's ability to protect and enhance these ORVs.

## SPECIFIC ISSUES

### Air Quality -- ORV

The 1980 General Management Plan identified removal of automobiles from the Valley as a primary objective. In the two intervening decades, the impact of the passenger automobile on air quality has diminished significantly, due to increased state emission requirements. The CMP proposes to replace private vehicle visitor transportation with a vast system of diesel-powered buses. The CMP must provide quantitative comparisons between the air pollution impacts of private vehicles and those for buses transporting an equivalent number of visitors. The analysis should also include an evaluation of the potential carcinogenic effects of the different pollutants. Although these effects on visitors may be negligible (because of their short exposure) the effects on permanent park personnel may be a significant consideration. The composition and concentration of these air pollutants is a direct function of user capacity

### Lodge Redevelopment

Two of the broad goals of the 1980 *General Management Plan* are: "let natural processes prevail" and "reclaim priceless beauty" (see Wild and Scenic Merced River Comprehensive Management Plan and Final Environmental Impact Statement p. 22 of 443). The 1997 flood was a **natural process** that damaged many of the Lodge accommodations. If the Lodge Redevelopment is to be accomplished in a manner that precludes damage from future floods, the revised CMP must describe – in a quantitative hydrologic analysis – how these structures "reclaim priceless beauty" and do not interfere with "natural processes."

Additionally, this increase in lodging accommodations will directly affect "User Capacity."

### Employee Housing

Since the Employee Housing facilities will also be constructed in the 100 year flood plain, the revised CMP must also describe – in a

**RECEIVED**SEP 16 2004  
RmR-5-119  
YOSEMITE NATIONAL PARK

Pg 4

quantitative hydrologic analysis – how these structures “reclaim priceless beauty” and do not interfere with “natural processes.”

Increases in employee accommodations implies an increase in employees to provide services to an increase in park visitors. How does this increased visitation affect the “User Capacity” of the River’s ORVs?

### **Northside Drive Relocation**

How will the relocation of northside drive affect the natural flow process of the River during flood events? Will the new asphalt surface result in additional contamination of the River water during rain events? If so, how much? (Provide estimates in ppb not vague, qualitative terms such as “negligible” or “insignificant”.) How is construction of this new road consistent with the objective to “reclaim priceless beauty?”

### **Southside Drive Widening**

See questions about Northside Drive above. Also, how much vegetation management would be involved with this project (acreage and basal area removal)? How is this vegetation management consistent with the objective to “reclaim priceless beauty?”

### **South Fork Bridge Replacement**

YAA agrees that the damaged South Fork Bridge must be replaced and the temporary bridge – which is an eyesore – removed. We also agree that the single span proposal will benefit the natural flow of the River. However we are not persuaded that the excessive lane width (16 feet) is necessary for either strength or safety. The standard lane width for federal highways is 12 feet, and the lanes on the El Portal Road are 11 feet wide. Reducing the lane width to 12 feet with an elevated 5 foot walkway (29 feet total) would cause a negligible reduction in the section modulus of the box girder. This reduction would be offset by the decreased static load resulting from the reduction in total concrete.

The original bridge, although detrimental to the free-flowing character of the River, was nevertheless tastefully constructed and harmonized with the natural surroundings. The proposed use of an artificial formliner finish for the replacement bridge, will appear to be



**RECEIVED**SEP 16 2004  
RMR-S-119  
YOSEMITE NATIONAL PARK

Pg 5 of 5

exactly what it is -- a flawed effort to simulate a natural appearance. The wall along the El Portal Road is an esthetic obscenity, illustrating the futility of human efforts to imitate the "priceless beauty" of nature.

The Park Service has an opportunity to apply a tasteful finish to the replacement bridge. The box girder vertical surfaces and wing walls can be finished with cut stone similar to the finish applied to the Cascades Bridge. Some of the costs for applying such a finish may be offset by the savings in materials resulting from reduction of the total lane width. If funding is not available at this time, construction of the girder and wing walls with plane (that is not a misspelling as indicated by a previous reviewer) surfaces would permit the application of such a finish at some future date. The use of the three dimensional formliner finish would foreclose this possibility. In our view, even the unfinished "plane surfaces" would be more acceptable than the obvious artificiality of the formliner finish

#### **Concurrence with other Comments**

YAA members have reviewed drafts of the comments that will be submitted by Friends of Yosemite Valley and Mariposans for Environmentally Responsible Government and support these comments. In the interest of avoiding redundancy, these comments are hereby incorporated by reference.

#### **Conclusion**

The revised CMP must analyze all projects that tiered to the previous CMP to determine how they will influence the "User Capacity" and how various levels of capacity affect the River's ORVs.

Respectfully

Conservation Chairman

#	1	2	2	T				
RT	#S	LT	DT	UT	IA	IR	OR	TS

RECEIVED

SEP 16 2004  
RMR-5-118  
YOSEMITE NATIONAL PARK

Pg 1

Alan Kunz

To: Mitzi Thornley/YOSE/NPS@NPS

09/13/2004 01:45 PM  
PDT

cc:  
Subject: Merced R W&S mgt plan SEIS

Alan Kunz  
National Park Service  
Yosemite National Park  
5083 Foresta Rd., Bldg. 759  
PO Box 700-W  
El Portal, CA 95318

209-379-1370 voice  
209-379-1149 fax

----- Forwarded by Alan Kunz/YOSE/NPS on 09/13/2004 01:48 PM -----



09/10/2004 04:32 PM  
MST  
Please respond to

To: "Yosemite Valley Plan/SEIS" <yose\_planning@nps.gov>

cc:  
Subject: Merced R W&S mgt plan SEIS

Superintendent Tollefson and Planning Staff: I submit remarks on scoping for the Merced River



SEIS. :

Tuolumne R--Merced R W&S mgt plan 0-0



RECEIVED

To: Mike Tollefson, Superintendent, Yosemite National Park  
yose\_planning@nps.gov

SEP 16 2004  
RMA-S-118  
YOSEMITE NATIONAL PARK

Attn: Revised Merced River Plan/SEIS

pg 2

Merced River W&S Management Plan Scoping Input for SEIS  
September 10, 2004  
From: Twain Harte CA

Superintendent Tollefson and Yosemite Planning Staff:

Since I have only been a casual observer of the Merced River inside Yosemite and outside for the past forty-six years, I will limit my input to one purpose of this present planning effort, "user capacities in the Merced River corridor". I have a more in-depth experience gained over that period with the neighboring Tuolumne River, from which my observations come.

I would expect that carrying capacity in those segments of the Merced River within Yosemite Wilderness to be controlled by wilderness goals.

For other segments of the River, I suggest that you not go beyond common sense, straight forward and normal aspects of the concept of carrying capacity such as significant human impact on water quality and bank erosion in that segment and impacts on stream users downstream. In doing this consider that most water quality impacts are generated by river contact less than a third of the hours a day and occur only seasonally, while bank erosion is cumulative and slow to heal. Gently sloping gravel putin and takeout areas may reduce bank damage and silt generation if the river will cooperate with these design features during times of high water.

I suggest you ignore or plan to minimize transient impacts from normal human sounds. There is something, perhaps of primeval origin, in cold-water sports in that we shout and exclaim joyfully. This phenomenon is not unique to any one type of watercraft or to swimming. This loud joyfulness carries over to the social intercourse immediately after leaving the stream. People gather and talk loudly before they disperse. I myself have experienced the negative impact of this behavior on campers at one takeout in a state recreation area when campers next to the takeout had their solitude interrupted by the arrival of 20 noisy boaters. I could only apologize to the campers who had no way of knowing they had chosen a campsite just 20 feet from the river and 20 feet from a designated, but unmarked takeout that had formerly been a campsite too. I could only tell these campers that we boaters would depart in a half hour or at least quiet down as we prepared to leave or became campers ourselves.

As a solution to the inevitable joyful noise of river users, I suggest you separate takeout and swimming areas a little way from campsites and other places non-boaters use for

solitude. Your present camping setback from streams provides much of this separation already for this minor impact.

Pg 3 of 3

Likewise, splashing by rafters and those floating on calm streams is a normal human activity and needs no regulation. The river itself splashes boaters in rough water.

Planners always think about how many people to allow at once in a given stretch of river. Boaters and probably swimmers will likely regulate themselves due to a general feeling against crowding. Planners can help boaters not to over crowd by the size and number of people working at a place where watercraft are rented. Permits to boat are sometimes used to reduce crowding in whitewater parts of rivers to allow plenty of room to maneuver.

A visual impact that staff can control is the specter of a ranger running downstream through tall grass, arms waving and shouting to a disappearing boater that they are in danger from rapids somewhere ahead is not what boaters or other visitors need to see. I have witnessed this site in Tuolumne Meadows. There is a better way. There are trail signs at points where needed, even in Yosemite Wilderness. So too there can be river signs posted and maintained annually along stream banks where less experienced boaters travel showing a large exclamation mark (!). Even uniformed boaters will realize something unexpected is ahead and will go to shore to check out the stream before proceeding. Many would also take note of written explanation of such signs given in the "Guide"

I hope you will find my remarks helpful in your work on the Merced River Plan.

I would like to receive a CD of this SEIS.



RECEIVED

I	1	2	2	C				
RT	#S	LT	DT	UT	IA	IR	OR	TS

Alan Kunz

09/13/2004 01:43 PM  
PDT

To: Mitzi Thornley/YOSE/NPS@NPS

cc:  
Subject: Comments for Revised Merced River Plan/SEIS

SEP 16 2004  
LmR-S-117  
YOSEMITE NATIONAL PARK

Pg1

----- Forwarded by Alan Kunz/YOSE/NPS on 09/13/2004 01:46 PM -----



09/10/2004 03:39 PM  
MST

To: Yose\_Planning@nps.gov

cc:  
Subject: Comments for Revised Merced River Plan/SEIS

If this is not the correct email address to provide comments regarding the Revised Merced River Plan/SEIS, please forward this email.

For the past 25 years, our middle-class family of four (2 adults, 2 children - now young adults) has camped in Yosemite Valley for one week each summer.

Not having a lot of money, we could not afford the cabin/hotel accommodations and so we chose to "rough it" by sleeping in tents in the Valley campgrounds for seven nights (the maximum stay). These experiences brought our family together and our children learned to respect nature and truly value the beauty and wonder of the natural environment.

We visited all of the available campgrounds and chose Upper River campground as our favorite (this was a "tents only" location, no RVs allowed). We were especially thrilled those years when we were lucky enough to obtain a campsite on the banks of the Merced River. How peaceful and delightful to be able to sit in our chairs next to the tent and be able to enjoy the Merced River.

As you can imagine, over the years we have explored each aspect of the valley - the hikes, the Visitor Center, the Indian demonstrations (a favorite), the walking tours, the Ranger talks, pony/horse rides and rafting down the Merced. Yosemite Valley holds a special place in our hearts and is filled with many wonderful memories that we continue to build on each year.

We were so dismayed when the Upper and Lower River campgrounds were flooded and the decision was made not to reopen them. So we chose the next desirable location which is North Pines Campground.

This past summer we were fortunate enough to have a North Pines site next to the River. Our neighbors, 2 adults and 2 children were visiting Yosemite for the first time. The parents did a good job of educating their young children about respecting nature, respecting the River, and keeping their site clean. It was wonderful to observe that those same values that we passed along to our children years ago were being passed on to a new generation.

We provided our comments a few years ago but it seemed that they were basically ignored. I truly hope that this time some of our comments are valued, respected and considered. We believe that it is possible to develop a harmony, a balance between keeping the Valley/River pure and natural with no evidence of human impact and the other extreme of being

SEP 16 2004  
RMR-5-117  
YOSEMITE NATIONAL PARK

overly developed and becoming a commercialized resort type area. We certainly hope that the NPS chooses to incorporate some of the wishes of the general public.

Pg 2 of 2

## SPECIFIC COMMENTS

1. Campers need more campsites and prefer to camp along the River bank. We value and respect the River and although I realize that walking down to the River may create a path, if this is so terrible, why allow any people whatsoever into the Valley? Upper and Lower River Campgrounds should be restored, and North Pines Campground should be retained. The current proposal mentions creating more "group" campsites and creating additional sites in Upper Pines. Geez, we're trying to enjoy nature and have a family experience - we don't want other campers so close to us that we all crammed into one little space. Many of the campsites in Upper Pines are way too close. And many times when there are more than 6 people in one campsite, that campsite is noisy and spoils the tranquility of the camping experience.

## #1 Summary:

RESTORE UPPER RIVER AND LOWER RIVER CAMPGROUNDS  
DO NOT REMOVE NORTH PINES CAMPGROUND  
EXPAND THE RIVER OVERLAY TO ALLOW FOR CAMPSITES ALONG THE MERCED RIVER  
DO NOT REMOVE THE HORSE STABLES  
DO NOT REMOVE THE APPLE ORCHARD  
KEEP YOSEMITE VALLEY AFFORDABLE FOR THE AVERAGE AMERICAN FAMILY

2. There should be a certain amount of cabin/hotel type accommodations but we do not believe that the numbers of the most expensive accommodations need to increase. Keep the valley accommodations affordable for the average American. It doesn't make sense that a for-profit company is running the concessionaire as their logical goal is to increase the profit margin. They would certainly want to increase profits with more commercialization. We believe that the average U.S. citizen wants to preserve the essence of the Valley rather than have further development, crowding, traffic and more roads/pavement.

Thank you for the opportunity to provide comments.

Sincerely,

San Diego, CA



RECEIVED

SEP 16 2004  
RmR-5-116  
YOSEMITE NATIONAL PARK

I	1	2	2	2				
RT	#S	LT	DT	UT	IA	IR	OR	TS

Alan Kunz

09/13/2004 01:43 PM  
PDT

To: Mitzi Thornley/YOSE/NPS@NPS

cc:

Subject: Possibly Spam: Comments Re: Establishing a user capacity for the entire length of the Merced ri

pg 1

----- Forwarded by Alan Kunz/YOSE/NPS on 09/13/2004 01:46 PM -----



To: yose\_planning@nps.gov

cc:

Subject: Possibly Spam: Comments Re: Establishing a user capacity for the entire length of the Merced ri

## Comments

Re:

Establishing a user capacity for the entire length of the Merced river corridor.

The User Capacity of the Merced River Corridor should never allow the NPS to dictate a future option of restricting private vehicular traffic inside YNP.

There should be No Limit on Vehicle Parking Places or Busing into Valley. This is an Elitist Insult and a Deprivation of a Liberty Enjoyed not only by Locals and Californians; but by the People of the World.

Dog on leash w/ visitor but not on a bus?

Freedom to move about with one's own vehicle and one's own dog. A bus would not take me where my auto goes - Zig Zagging through the valley at my pleasure.

How would Disabled Individuals be Able to Access the Park - Not on a Crowded Bus and with a lack of necessary special equipment...

Fact = Not everyone can afford to park or stay at the Ahwahnee.

Buses Not Only Pollute and make for a Noisier Environment but do not allow for Privacy of visitors or Families nor for Carrying Picnic or Recreational Equipment.

More Lodge Rooms & More Affordable Housing are Needed - Especially Campsites!

There are Already too many restricted areas and Roads:  
ie: Road toward Mirror Lake etc

Tearing Down Bridges is Unnecessary.

The Fire Fall Should be Reinstated.

RECEIVED

SEP 16 2004  
RMR-5-112  
YOSEMITE NATIONAL PARK

**Environmental Extremism is Rampant in the Plan.**

*Pg 2 of 2*

**This Plan Demonstrates Environmental Overprotection at the Expense of the  
People who wish to enjoy Yosemite - a National Scenic Treasure - which belongs  
to the people for the sake of the people.!**